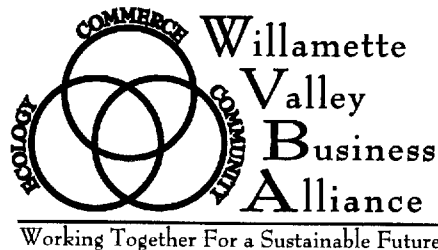


May 5th, 1999



Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

0628 '99 MAY 13 A9:15

To whom it may concern:

In reference to the issue of how best to label irradiated foods (Docket #98N-1038 "Irradiation in the production, processing and handling of food"), I believe that any failure to include the words irradiation or irradiated and the use of the radura symbol could only be viewed as an attempt to mislead the consumer.

Irradiation takes away nutrients and alters properties of food in ways not apparent to the consumer. Labeling is critical. For many it's their best and primary source of information for their food choices. The corporations instigating this effort know this, otherwise they would have no reason to attempt to diminish or eliminate the irradiation labeling.

The word Irradiation describes the process. If the process is harmful and people recognize this then the labeling is effective. If there is no labeling or the labeling changes, it means there is an effort endorsed by the government to deceive people so that certain corporations can make more money at the expense of peoples health. This is the kind of activity which earns the government distrust. The fact that these things even get the attention of taxpayer dollars is infuriating to me.

So this is really a no-brainer. Foods should not be irradiated in the first place. If they are, they should be prominently labeled and all irradiated components of a food should be identified. This labeling requirement should not expire until, guess what? Until they stop irradiating the food!

Here is a tidbit worth some adult human attention. Everything is connected. We must understand the whole system if we are to intervene appropriately, otherwise our intervention must ultimately create more harm than good. I recommend Allan Savory's book *Holistic Management* for anyone who wishes to begin (or continue) the journey of whole systems thinking which will, if we are fortunate, define the next century of human thought.

One more historical note. The license to do business was conceived as a service activity for the common good. Misuse of this license should be grounds for banishment from it's use.

Those who seek to make profit through deceit and obfuscation and who seek the assistance of the federal government to do so should be barred from participating in the service of business.

Thanks for your consideration of these matters.

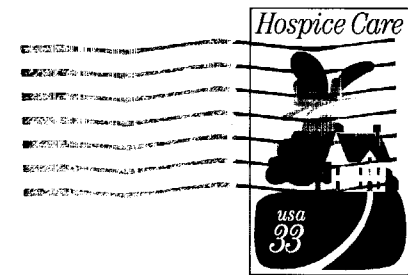
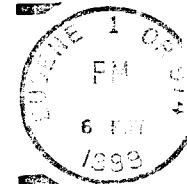
Sincerely,


Patrick L. Fagan
WVBA Board Member

98N-1038

C1553





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